

JOSEPH W. URNER and
IRMA A. URNER, his wife
36 East Second Street
Frederick, Maryland, 21701,
Plaintiffs

: NO. 27607 EQUITY

Vs

STEPHEN WILLIAM COLBY and
KATHRYN NAINETTE COLBY, his wife, : IN THE CIRCUIT COURT
Route 5, Alternate Route 40
Braddock Heights, Maryland, 21714

and

UNKNOWN HEIRS, DEVISEES,
PERSONAL REPRESENTATIVES,
DECENDENTS OR SUCCESSORS IN
INTEREST OF JOHN SIFFORD,

Defendants

: FOR FREDERICK COUNTY

BILL OF COMPLAINT

TO THE HONORABLE, THE JUDGES OF SAID COURT:

This, the Bill of Complaint of Joseph W. Urner and Irma A. Urner, his wife, by Byron, Moylan & Urner, their attorneys, respectfully represents unto your Honors:

1. That they are the owners in fee simple of all of four (4) lots or parcels of land in Braddock Election District, Frederick County, State of Maryland, by virtue of a deed to them dated September 12, 1952 from Charles U. Price and recorded among the Land Records of Frederick County, Maryland, in Liber 506, folio 276, a copy of which is attached hereto and incorporated herein as Exhibit No. 1. That the aforesaid four (4) parcels are more particularly described in a survey made by Fox & Associates, Inc. dated August 30, 1977, a copy of which is attached hereto and incorporated herein as Exhibit No. 2.

2. That the above described real estate was conveyed to Charles U. Price, unmarried, by a deed from the aforesaid Irma A. Urner and Joseph W. Urner, dated September 12, 1952, and recorded in Liber 506, folio 274 among the Land Records of Frederick County, Maryland, a copy of which is attached hereto and incorporated herein as Exhibit No. 3.

3. That the aforesaid property was conveyed to Irma A. Urner, her heirs and assigns, by deed from Dudley M. Page and Myrtle M. Page, his wife, dated March 27, 1950 and recorded among the Land Records of Frederick County, Maryland in Liber 484, folio 51, a copy of which is attached hereto and incorporated herein as Exhibit No. 4. The aforesaid Grantors, Dudley M. Page and Myrtle M.